

12 July 2017

Review Secretariat  
Review of Pharmacy Remuneration and Regulation  
The Australian Government Department of Health

Dear Professor King, Bill Scott and Jo Watson,

I wish to make a submission to the Pharmacy Remuneration & Regulation Interim Report expressing my strong rejection of the proposed option (Option 3-4) for homoeopathic products not to be sold in PBS-approved pharmacies.

This option directly contradicts the basic criteria of the Review's strategic vision: that is, it is not 'forward-looking', does not 'encourage innovation' and it is inconsistent with 'adapting to the changing needs of the Australian public' - who want greater access to medicines of their choice, not less.

70 per cent of Australians use complementary medicine services and products. Removing homoeopathic products in pharmacies does not represent of the views or desires of the Australian community.

The Review has ignored the safe and widespread use of homoeopathic products in pharmacies overseas. For example, Europe, where 29% of citizens freely access homoeopathic products in pharmacies.

The Review inappropriately cites the NHMRC *Homeopathy Review* findings as a credible policy document - when it is not. The Panel's discussions and opinions on the efficacy on homoeopathy are based solely on the highly flawed NHMRC *Homeopathy Review*, without recognising its limitations or considering the broader research evidence base and other positive reports. The Report does not provide any evidence for its position that the '*sale of homeopathic products is not benign but creates risk of harm*', which is based on speculation, not evidence.

NHMRC conducted a sham public consultation process, where none of any additional evidence submitted was included in the Overview and a member of a leading anti-homoeopathy lobby group (Friends of Science in Medicine) was contracted to consider it.

I am not aware of any cases of harm caused by homoeopathic medicines, but I am aware that many pharmaceutical medicines have serious side effects, which is why I believe homoeopathy should remain as a safe treatment option for Australians.

I have used homoeopathic medicines for myself and my family with great benefit. Homoeopathic products have been available in pharmacies for years without any evidence that they create 'risk of harm to patient health': a view based on speculation, not evidence.

Australians are discerning people who spend their money wisely. Around a million Australian use homoeopathy, not by error of judgment but because they (like me) find that it works. A healthy democracy protects the rights of citizens to choose and access the healthcare and medicines they want - that's what a free and healthy society does.

Yours sincerely,

Rosemary Warries